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*Attorneys for Plaintiff Armin Azod*

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

ARMIN AZOD, an individual,

Plaintiff,

v.

JAMES G. ROBINSON, an individual,

Defendant.

Case No.: 2:16-cv-02295

**COMPLAINT FOR DAMAGES AND EQUITABLE RELIEF:**

**1. Assault**

**DEMAND FOR JURY TRIAL**

Plaintiff ARMIN AZOD ("Plaintiff"), by and through his undersigned counsel, alleges against Defendant JAMES G. ROBINSON ("Defendant") the following:

**VENUE AND JURISDICTION**

1. This Court has diversity jurisdiction over this matter pursuant to 28 U.S.C. § 1332(a)(1) and (a)(4) because the controversy in this matter exceeds the sum of $75,000 and the parties are citizens of different states. As explained below, Plaintiff is a citizen of the State of California. Defendant is a citizen of the state of Maryland.

2. Venue in the United States District Court for the Central District of California is proper under 28 U.S.C. § 1391(b)(2) because all of the events giving rise to the claim occurred in the city of Los Angeles, specifically at 10351 Santa Monica Boulevard, Los Angeles, California 90025.

**PARTIES**

3. Plaintiff is, and at all relevant times herein was, an individual residing in the County of Los Angeles, State of California.

4. Plaintiff is informed and believes, and thereon alleges, that Defendant is a natural person and at all relevant times herein was a citizen of the state of Maryland.

**GENERAL ALLEGATIONS**

5. Defendant has assaulted Plaintiff by threatening severe bodily injury through his hostile words and overt conduct of attempting to strike Plaintiff's head with a brass statue, as set more fully below.

6. On or about October 15, 2014, Plaintiff, a patent attorney and his business partners in a startup company entered into an asset purchase agreement with Defendant, who is a billionaire film director. Through the terms of the asset purchase agreement, and many oral promises, Defendant agreed to assist in the funding, development, and commercialization of Plaintiff and his partners' technology. The asset purchase agreement enabled Defendant's company to acquire Plaintiff and his partners' company and in exchange, Defendant agreed to sponsor research and commercialize revolutionary technology owned by Plaintiff's company.

7. Defendant breached his obligations under the asset purchase agreement. On information and belief, Defendant, because of his wealth, believed that he was above the terms of the contract and law, and that he could do and say whatever he wanted without consequence. Defendant consciously withheld proper payment of the purchase price set forth in the agreement, misrepresented his income before, and refused to pay proper fees to the United States Patent and Trademark Office, and failed to sponsor Plaintiff's research—all in breach of the asset purchase agreement as well as United States patent laws.

8. On or about January 20, 2016, Plaintiff filed a lawsuit against Defendant for his misconduct in the United States District Court, Central District of California, case number 2:16-cv-00440-JFW (Ex).

9. After Plaintiff filed the district-court complaint against Defendant, Plaintiff received a call and several emails from Defendant's office assistant, Bryan Burra, who stated that Defendant wanted to speak to Plaintiff about the district-court lawsuit. In response to Defendant's several attempts to meet with Plaintiff in person, at approximately 3:30 p.m. on or about February 19, 2016, Plaintiff met with Defendant at Defendant's Morgan Creek Productions office located at 10351 Santa Monica Boulevard, Los Angeles, California 90025. (Defendant is the owner and co-founder of blockbuster film company Morgan Creek Productions—which has produced such films as the Ace Ventura films, the Young Guns films, Major League, Robin Hood: Prince of Thieves, The Last of the Mohicans, and True Romance.)

10. During the meeting with Plaintiff at his office, the two discussed Defendant's worldviews for about an hour and a half. Also present at the meeting were Defendant's assistant, Mr. Burra and a young female law school graduate who stated that she had taken the bar exam but was awaiting bar results. Then, Defendant turned to the subject of the district-court lawsuit filed by Plaintiff. At this point, Defendant began to raise his voice at Plaintiff, then screamed that he would not "pay anyone a single red cent."

11. After Defendant's obvious growing hostility, Plaintiff started to become uncomfortable and wanted to leave Defendant's office. Therefore, Plaintiff stated to Defendant

that his parking meter was about to run out, he had already been in the office for almost two hours, and that he had to leave. At this point, Defendant became irate and said to Plaintiff: "You talk like a lawyer. Let me get up from my desk and throw this brass thing at your head." Defendant then lifted a large brass statue from his desk to throw at Plaintiff's head.

12. Plaintiff, seriously concerned for his safety, rushed out of Defendant's office as Defendant yelled at him "fuck you!" Plaintiff was able to escape from Defendant's office before Defendant had a chance to throw the brass statue.

## FIRST CAUSE OF ACTION

## ASSAULT

13. Plaintiff hereby re-alleges and incorporates by this reference each and every allegation contained in this Complaint as if fully set forth herein.

14. On or about February 19, 2016, at Defendant's office located in Los Angeles, California, Defendant unlawfully and intentionally assaulted Plaintiff by threatening to strike Plaintiff's head with a brass statue without Plaintiff's consent.

15. Defendant intended to cause bodily harm on Plaintiff when he yelled, "let me get up from my desk and throw this brass thing at your head," then lifted a large brass statue to throw at Plaintiff's head.

16. Plaintiff reasonably believed he was in danger of immediate physical injury at the hands of Defendant.

17. As a proximate result of Defendant's actions, Plaintiff sustained severe emotional distress.

18. As a proximate result of the actions of the Defendant, Plaintiff sustained general and special damages in an amount to be proven at trial, but at least in an amount over $1,000,000.

19. Defendant committed these actions with malice, fraud, and oppression, and thus an award for punitive and exemplary damages is justified.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff prays judgment against Defendant as follows:

1. For general and special damages in excess of $1,000,000;
2. For punitive and exemplary damages according to proof;
3. For costs of suit incurred herein; and
4. For such other and further relief as this Court deems just and proper.

DATED: April 4, 2016 JAURIGUE LAW GROUP

*/s/ Sehreen Ladak*
Michael J. Jaurigue
Abigail A. Zelenski
Sehreen Ladak
*Attorneys for Plaintiff*

**JURY DEMAND**

Plaintiff demands trial by jury on all causes of action.

DATED: April 4, 2016 JAURIGUE LAW GROUP

*/s/ Sehreen Ladak*
Michael J. Jaurigue
Abigail A. Zelenski
Sehreen Ladak
*Attorneys for Plaintiff*